

1 **GPA**  
AARON D. FORD  
2 Attorney General  
Robert A. Whitney (Bar No. 8726)  
3 Senior Deputy Attorney General  
State of Nevada  
4 Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
5 Las Vegas, NV 89101  
(702) 486-3104 (phone)  
6 (702) 486-0660 (fax)  
rwhitney@ag.nv.gov  
7 Attorneys for the State of Nevada

8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

|  |                         |
|--|-------------------------|
| 10 STATE OF NEVADA,                                | Case No.: C-22-363182-1 |
| 11 Plaintiff,                                      | Dept. No.: XXI          |
| 12 v.  |                         |
| 13 <b>MANDEEP SINGH</b> and <b>JASPREET KAUR</b> , |                         |
| 14 Defendant.                                      |                         |

15  
16 **GUILTY PLEA AGREEMENT**

17 I hereby agree to plead guilty to crimes of one (1) count of SECURITIES FRAUD, a category  
18 "B" felony in violation of NRS 90.570(2), NRS 90.650, as more fully alleged in the charging document  
19 attached hereto as Exhibit "1."

20 My decision to plead guilty is based upon the plea agreement in this case, which is as follows:

- 21 1. The State agrees to not oppose probation.
- 22 2. The State will not oppose Defendant traveling out of state solely for purposes of  
23 work/employment.
- 24 3. I agree to serve a term of incarceration of a minimum term of 48 months, with a maximum  
25 of 120 months, suspended;
- 26 4. I agree to pay restitution in an amount to be determined to be distributed to victims of  
27 **MANDEEP SINGH** and **JASPREET KAUR**, who are: Hapreet Kaur, Harpal Padam, Jim Kauffman,  
28 Anshu Pathak, Shyam Kannam, and Varinder Singh.



1 I also understand that I must submit to blood and/or saliva tests under the direction of the Division  
2 of Parole and Probation to determine genetic markers and/or secretor status.

3 I understand that if more than one sentence of imprisonment is imposed and I am eligible to serve  
4 the sentences concurrently, the sentencing judge has the discretion to order the sentences served  
5 concurrently or consecutively.

6 I understand that information regarding charges not filed, dismissed charges, or charges to be  
7 dismissed pursuant to this agreement may be considered by the judge at sentencing.

8 I have not been promised or guaranteed any particular sentence by anyone. I know that my  
9 sentence is to be determined by the Court within the limits prescribed by statute. I understand that if my  
10 attorney or the State of Nevada or both recommend any specific punishment to the Court, the Court is  
11 not obligated to accept the recommendation.

12 I understand the Division of Parole and Probation will prepare a report for the sentencing judge  
13 prior to sentencing. This report will include matters relevant to the issue of sentencing, including my  
14 criminal history. This report may contain hearsay information regarding my background and criminal  
15 history. My attorney and I will each have the opportunity to comment on the information contained in  
16 the report at the time of sentencing. Unless the Attorney General has specifically agreed otherwise, the  
17 Attorney General may also comment on this report.

18 I understand if the offense to which I am pleading guilty was committed while I was incarcerated  
19 on another charge or while I was on probation or parole that I am not eligible for credit for time served  
20 toward the instant offense(s).

21 I understand that if I am not a United States citizen, this criminal conviction will likely result in  
22 serious negative immigration consequences including but not limited to: removal from the United States  
23 through deportation; an inability to reenter the United States; the inability to gain United States  
24 citizenship or legal residency; an inability to renew and/or retain any legal residency status; and/or an  
25 indeterminate term of confinement, with the United States Federal Government based on my conviction  
26 and immigration status. Regardless of what I have been told by an attorney, no one can promise me that  
27 this conviction will not result in negative immigration consequences and/or impact my ability to become  
28 a United States citizen and/or legal resident.

**WAIVER OF RIGHTS**

1  
2 By entering my plea of guilty, I understand that I am waiving and forever giving up the following  
3 rights and privileges:

4 1. The constitutional privilege against self-incrimination, including the right to refuse to  
5 testify at trial, in which event the prosecution would not be allowed to comment to the jury about my  
6 refusal to testify.

7 2. The constitutional right to a speedy and public trial by an impartial jury, free of excessive  
8 pretrial publicity prejudicial to the defense, at which trial I would be entitled to the assistance of an  
9 attorney, either appointed or retained. At trial the State would bear the burden of proving beyond a  
10 reasonable doubt each element of the offense charged.

11 3. The constitutional right to confront and cross-examine any witnesses who would testify  
12 against me.

13 4. The constitutional right to subpoena witnesses to testify on my behalf.

14 5. The constitutional right to testify in my own defense.

15 6. The right to appeal the conviction, with the assistance of an attorney, either appointed or  
16 retained, unless the appeal is based upon reasonable constitutional, jurisdictional or other grounds that  
17 challenge the legality of the proceedings and except as otherwise provided in subsection 3 of NRS  
18 174.035.

**VOLUNTARINESS OF PLEA**

19  
20 I have discussed the elements of all the original charges against me with my attorney and I  
21 understand the nature of the charges against me.

22 I understand the State would have to prove each element of the charges against me at trial.

23 I have discussed with my attorney any possible defenses, defense strategies and circumstances  
24 which might be in my favor.

25 All of the foregoing elements, consequences, rights, and waiver of rights have been thoroughly  
26 explained to me by my attorney.

27 I believe that pleading guilty and accepting this plea bargain is in my best interest, and that a trial  
28 would be contrary to my best interest.

1 I am signing this agreement voluntarily, after consultation with my attorney, and I am not acting  
2 under duress or coercion or by virtue of any promises of leniency, except for those set forth in this  
3 agreement.

4 I am not now under the influence of any intoxicating liquor, a controlled substance or other drug  
5 which would in any manner impair my ability to comprehend or understand this agreement or the  
6 proceedings surrounding my entry of this plea.

7 My attorney has answered all my questions regarding this guilty plea agreement and its  
8 consequences to my satisfaction and I am satisfied with the services provided by my attorney.

9 DATED this 4<sup>th</sup> day of ~~March~~<sup>April</sup>, 2022.

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12  
13 AGREED TO BY:

14 /s/ Robert A. Whitney  
15 ROBERT WHITNEY (Bar No. 8726)  
16 Senior Deputy Attorney General

11 Mandeep Singh  
12 (MANDEEP SINGH, Defendant

Signed by Adam Gill #11575  
at the direction of Mandeep  
Singh pursuant to  
Admin Order 20-06

CERTIFICATE OF DEFENSE COUNSEL

I, the undersigned, as the attorney for Mandeep Singh, the Defendant named herein, and as an officer of the court hereby certify that:

1. I have fully explained to Defendant the allegations contained in the charges to which guilty pleas are being entered.

2. I have advised Defendant of the penalties for each charge and the restitution that Defendant may be ordered to pay.

3. I have inquired of Defendant facts concerning Defendant's immigration status and explained to Defendant that if Defendant is not a United States citizen any criminal conviction will most likely result in serious negative immigration consequences including but not limited to:

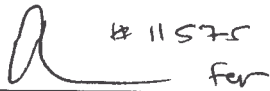
- a. The removal from the United States through deportation;
- b. An inability to reenter the United States;
- c. The inability to gain United States citizenship or legal residency;
- d. An inability to renew and/or retain any legal residency status; and/or
- e. An indeterminate term of confinement with the United States Federal Government based on his/her conviction and immigration status.

Moreover, I have explained that regardless of Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.

4. All pleas of guilty offered by Defendant pursuant to this agreement are consistent with all the facts known to me, and are made with my advice to Defendant and are in the best interest of Defendant:

5. To the best of my knowledge and belief Defendant:
- a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement;
  - b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily; and
  - c. Was not under the influence of intoxicating liquor, a controlled substance, or other drug at the time I consulted with the Defendant as certified in paragraph 1 and 2 above, or at the time of execution of this agreement.

DATED this 14<sup>th</sup> day of ~~March~~<sup>April</sup>, 2021

  
Michael Aisen, Esq  
Attorney for Defendant Mandeep Singh



1 **INFM**  
2 AARON D. FORD  
3 Attorney General  
4 Robert A. Whitney (Bar No. 8726)  
5 Senior Deputy Attorney General  
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12 rwhitney@ag.nv.gov  
13 Attorneys for the State of Nevada

8 **DISTRICT COURT**  
9 **CLARK COUNTY, NEVADA**

10 STATE OF NEVADA,

11 Plaintiff,

12 v.

13 MANDEEP SINGH

14 Defendant.

Case No.: C-22-363182-1

Dept. No.: XXI

16 **INFORMATION**

17 AARON D. FORD, Attorney General for the State of Nevada, in the name and by the authority  
18 of the State of Nevada, informs the Court:

19 MANDEEP SINGH has committed the crime of one (1) count of SECURITIES FRAUD a  
20 category "B" felony in violation of NRS 90.570(2), NRS 90.650.

21 All of the acts alleged herein have been committed or completed on or between July 1, 2016 and  
22 November 18, 2016, by the above-named defendant, within the County of Clark, State of Nevada, in the  
23 following manner:

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28 ///

**COUNT I**  
**SECURITIES FRAUD**  
**Category "B" Felony - NRS 90.570(2), NRS 90.650**

That on or between July 1, 2016 and November 18, 2016, Defendant MANDEEP SINGH, in the County of Clark, State of Nevada, in connection with an offer to sell, sale, offer to purchase or purchase of a security, did directly or indirectly make an untrue statement of material fact, or omit to state a material fact necessary in order to make statements made not misleading in light of the circumstances under which they were made, to wit:

On or between July 1, 2016 and November 18, 2016, in connection with the offer to sell or purchase and/or sale or purchase of stocks and/or limited partnership interest and/or an interest in Varinder Singh's company, Quick Biodiagnostic Laboratory ("QBL"), MANDEEP SINGH told Varinder Singh that MANDEEP SINGH had taken out a loan to fund part or all of his purchase of the stocks and/or limited partnership interest and/or interest in QBL, and that MANDEEP SINGH had deposited or arranged for the deposit of money into QBL's bank account for payment or partial payment of the purchase price of said stocks and/or limited partnership interest and/or interest in QBL. However, in making the statement or statements to Varinder Singh regarding the loan and/or money deposited into QBL's account as payment or partial payment of the purchase price MANDEEP SINGH willfully and unlawfully omitted a material fact or material facts necessary to make MANDEEP SINGH's statements not misleading in light of the circumstances in which MANDEEP SINGH made them by:

- MANDEEP SINGH omitted the fact that MANDEEP SINGH had used QBL's and/or Varinder Singh's name and/or information to apply for and obtain the loan;
- AND/OR by MANDEEP SINGH omitting the fact that the money deposited into QBL's account came from the loan that MANDEEP SINGH took out using QBL's and/or Varinder Singh's name and/or information.

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1 All of which constitutes the crime of SECURITIES FRAUD in violation of NRS 90.570(2), NRS  
2 90.650.

3 DATED this 14<sup>th</sup> day of March, 2022.

4 AARON D. FORD  
5 Attorney General

6 By: /s/ Robert A. Whitney  
7 Robert A. Whitney (Bar No. 8726)  
8 Senior Deputy Attorney General  
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